



Federal Communications Commission
Washington, D.C. 20554

May 6, 2021

Ms. Patricia Cooper
SpaceX Services, Inc.
1155 F Street, N.W.
Washington, DC 20004
Email: Patricia.Cooper@spacex.com

Re: Gateway Earth Station: SpaceX Services, Inc.:
IBFS File No. SES-LIC-20201019-01147, Call Sign: E202175

Dear Ms. Cooper:

On October 19, 2019, SpaceX Services, Inc. (SpaceX) filed the above referenced application for a gateway earth station to operate in Dumas, TX. The application must demonstrate compliance with rules concerning compatibility with Upper Microwave Flexible Use Service (UMFUS) operations.¹ We request that SpaceX submit the following information to clarify or supplement its initial showing for this application:

- 1) In comparing the earth station coordinate information provided in the Form 312, Application Narrative and Coordination Report, the latitude coordinates do not match. Assuming the latitude coordinates are correct in the Application Narrative and Coordination Report, please amend the latitude coordinates in Form 312 to align with the rest of the application.
- 2) In accordance with 47 CFR § 25.136(a)(4)(ii) and the analysis provided, please identify the exact location of the proposed earth station by placing a dot, flag, or pushpin on each plot. Each plot should also show county boundaries, and include a map legend containing distance/mileage scale for measuring the relative size of the proposed contour.
- 3) In accordance with 47 CFR § 25.136(a)(4)(ii), specify whether and to what extent SpaceX is using a "clear sky power" value. SpaceX's demonstration should take into account worst case input power density in addition to input power density during clear sky conditions. If relying on clear sky conditions, please explain why that assumption is appropriate for this specific circumstance and location.
- 4) In accordance with 47 CFR § 25.136(a)(4)(iii), SpaceX is requested to certify that the earth station's PFD contour will not cross any roads classified as "Other Freeways and Expressways or Other Principal Arterials," based on more than a simple visual inspection using Google-Earth software. If SpaceX plans to rely on terrain, clutter and/or shielding installation to comply with requirements of these rules, SpaceX should provide details and analysis about these method(s) and mitigating effects, and how it will ensure compliance with the rules.

¹ 47 CFR § 25.136. *See also* International Bureau Issues Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Frequency Bands to Demonstrate Compliance with Section 25.136, Public Notice, Report No. SPB-281, DA 20-631 (June 16, 2020).

- 5) In accordance with 47 CFR § 25.136(a)(4)(iv), please clarify why there is a difference in the "height above ground level" value in the Comsearch Coordination Report, as compared to the "height above ground level" value reflected in the application. If this is an error in the Comsearch Coordination Report, please rerun the analysis and re-coordinate with the affected parties, if necessary. For any errors, please correct/amend the application accordingly.

Please submit the requested information within **30 days** of the date of this letter.

Sincerely,

Kerry E. Murray

Kerry E. Murray
Deputy Chief, Satellite Division
International Bureau